

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: GENERIC PHARMACEUTICALS  
PRICING ANTITRUST LITIGATION

MDL 2724  
16-MD-2724  
HON. CYNTHIA M. RUFE

THIS DOCUMENT RELATES TO:

*ALL ACTIONS*

**PLAINTIFFS' UNOPPOSED MOTION TO FILE UNDER SEAL THEIR  
RESPONSE TO DEFENDANT TEVA PHARMACEUTICAL USA, INC.'S MOTION  
FOR RECONSIDERATION OF THE COURT'S JULY 13, 2020 MEMORANDUM AND  
ORDER ON BELLWETHER SELECTION**

Pursuant to Rule 5.2(d) of the Federal Rules of Civil Procedure, and Local Rules 5.1.2(7) and 5.1.5, Direct Purchaser Plaintiffs, End-Payer Plaintiffs, Indirect-Reseller Plaintiffs, the State Attorneys General, and the Direct Action Plaintiffs (collectively, "Plaintiffs") hereby move the Court for an Order granting leave to file under seal their *Response to Defendant Teva Pharmaceutical USA, Inc.'s Motion for Reconsideration of the Court's July 13, 2020 Memorandum and Order on Bellwether Selection* ("Plaintiffs' Response").

Plaintiffs' Response refers to and quotes from Teva Pharmaceutical USA, Inc.'s Motion for Reconsideration of the Court's July 13, 2020 Memorandum and Order on Bellwether Selection (MDL Docket. No. 1594), which was filed under seal.

To avoid disclosure of material that the Court has already or may in the future Order be filed under seal, Plaintiffs respectfully request leave to file Plaintiffs' Response under seal as well. Defendant Teva has consented to the relief sought in this Motion.

Pursuant to the Court's March 25, 2020 Notice to Filers of Hard Copy Documents to Resubmit Electronically posted on the Court's website,<sup>1</sup> Plaintiffs have submitted an unredacted PDF version of Plaintiffs' Response via email to the Clerk's office.

Contemporaneously with this Motion, Plaintiffs have filed via ECF a redacted public version of Plaintiffs' Response.

A proposed Order is attached hereto.

Dated: November 20, 2020

Respectfully submitted,

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<sup>1</sup> [https://www.paed.uscourts.gov/documents/notices/not\\_resubmit%20hard%20copy%20documents%20electronically.pdf](https://www.paed.uscourts.gov/documents/notices/not_resubmit%20hard%20copy%20documents%20electronically.pdf)

By: /s/ William J. Blechman

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